

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

FARHAD AZIMA,  
ALG TRANSPORTATION, INC.,  
MAIN 3260 LLC,  
FFV W39 LLC, AND  
FFV DEVELOPMENT LLC,

Plaintiffs,

-against-

DECHERT LLP,  
DAVID NEIL GERRARD,  
DAVID GRAHAM HUGHES,  
NICHOLAS DEL ROSSO,  
VITAL MANAGEMENT SERVICES, INC.,  
AMIT FORLIT,  
INSIGHT ANALYSIS AND RESEARCH LLC,  
SDC-GADOT LLC,  
AMIR HANDJANI,  
ANDREW FRANK, and  
KARV COMMUNICATIONS,

Defendants.

**Civil Action No. 22-CV-8728 (PGG)**

**NOTICE OF DEFENDANT  
DAVID GRAHAM HUGHES'  
MOTION TO DISMISS  
THE COMPLAINT**

**Oral Argument Requested**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendant David Graham Hughes' Motion to Dismiss, dated February 28, 2023, and the Joint Memorandum of Law in Support of Defendants' Motions to Dismiss, dated February 28, 2023, defendant David Graham Hughes, by his undersigned attorneys, will move this Court, before the Honorable Paul G. Gardephe, United States District Judge for the Southern District of New York, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, at a date and time to be determined by the Court, for an order pursuant to Rules 12(b)(2) and 12(b)(6) of the Federal Rules of Civil Procedure dismissing plaintiffs' complaint, and for such other and further relief as the Court deems just and proper.

Dated: February 28, 2023  
New York, New York

A handwritten signature in blue ink, appearing to read 'Helen Gredd', positioned above a horizontal line.

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